

## REMARKS

The specification and drawings have been amended to conform with 37 CFR 1.121. In the specification, on page 6, lines 6-7, "Figure 3" has been changed to --Figure 4-- and "step 112" has been changed to --step 116--. In the drawings, the direction of the arrow for handover event 62 has been reversed. No new matter has been introduced by way of amendment.

In the patent application claims 1-18 are pending. In the office action, all pending claims are rejected.

At section 2 of the office action, claims 1-18 are rejected under 35 U.S.C. 103(a) as being unpatentable over *Grilli et al.* (U.S. Patent No. 6,438,117, hereafter referred to as *Grilli*), in view of *Willars* (U.S. Patent No. 6,597,679). The Examiner uses Figure 8 of *Grilli* to show that there are overlapping areas between GSM cells and CDMA cells. The Examiner also considers the CDMA frequencies of neighboring cells as being equivalent to the first list of the first sub-network, and the list of frequencies of the neighboring GSM cells as being equivalent to the second list of second sub-network. The Examiner admits that *Grilli* fails to disclose handover between WCDMA and GSM systems, but points to *Willars* for disclosing such handover.

It is respectfully submitted that *Grilli* discloses a method of intra-operator handover for handing over a mobile station between a GSM/TDMA base station and a CDMA base station, where both base stations are jointly controlled by a mobile switching station (MSC) (col. 12, lines 14 - 17). Figure 13 in *Grilli* illustrates the communication between the MSC and the two base stations. However, *Grilli* does not disclose or even suggest that the GSM/TDMA base station is operated by one network operator while the CDMA base station is operated by a different network operator. In contrast, the handover in the claimed invention is concerned with inter-operator operation. *Willars* discloses using compressed mode techniques to allow a mobile terminal to take measurements on a different frequency in preparation for inter-frequency transfer. *Willars* has nothing to do with inter-operator handover.

For the foregoing reasons, it is respectfully submitted that the claimed invention is distinguishable over *Grille* in view of *Willars*. Early allowance of claims 1-18 is earnestly solicited.

Respectfully submitted,

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ANNOTATED MARKED-UP DRAWING

Approved  
RE  
03/16/04

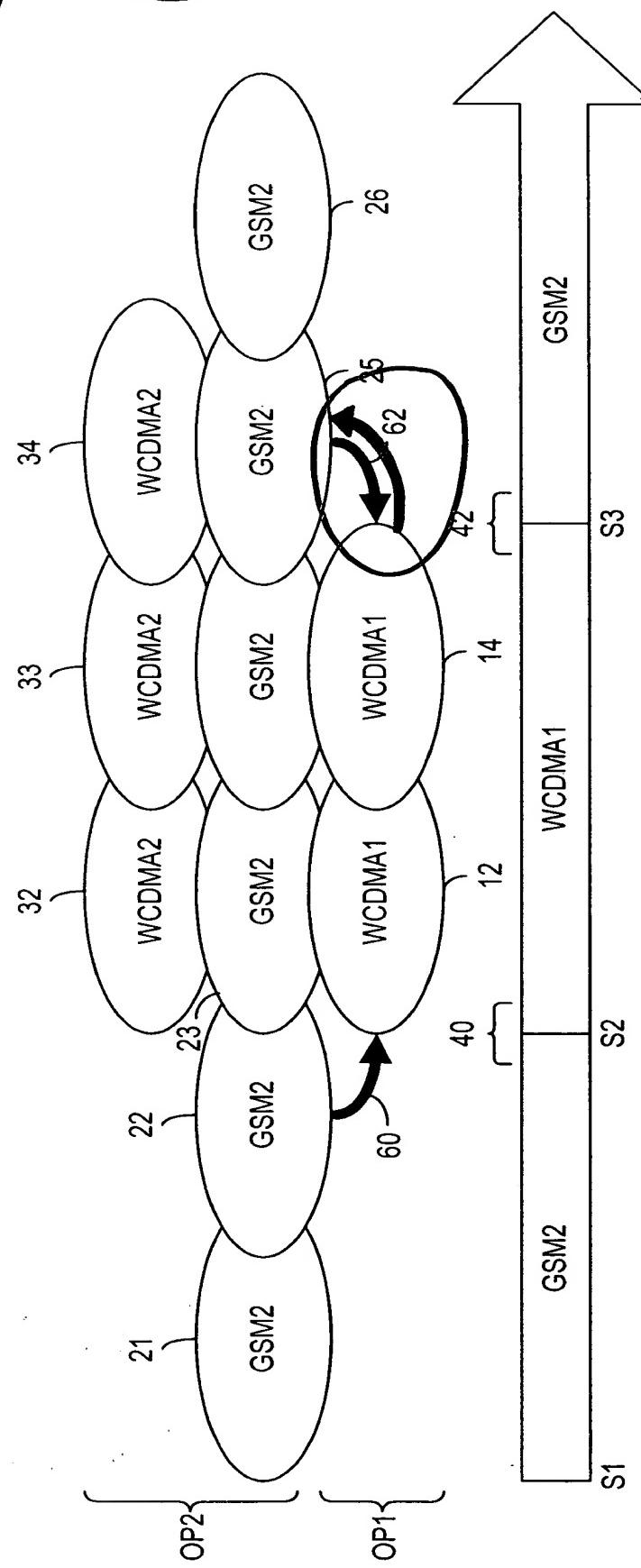
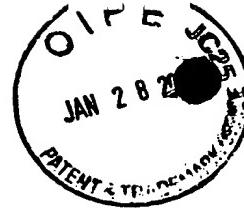


FIG. 1